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18 UNITED STATES DISTRICT COURT
19 DISTRICT OF NEVADA

20 Cung Le, Nathan Quarry, Jon Fitch, Brandon
21 Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
22 others similarly situated,

23 Plaintiffs,

24 v.

25 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

26 Defendant.
27
28

Case No.: 2:15-cv-01045-RFB-(PAL)

**JOINT MOTION TO EXTEND
DEADLINE FOR ZUFFA TO FILE
MOTION TO SEAL PLAINTIFFS'
OPPOSITION TO ZUFFA'S
MOTION FOR SUMMARY
JUDGMENT (ECF NO. 599)**

(First Request)

1 Pursuant to Local Rules IA 6-1 and 26-4, Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,
2 Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury (“Plaintiffs”) and Defendant Zuffa, LLC
3 (“Zuffa”) (collectively, “the Parties”), by and through their undersigned attorneys, move to extend the
4 deadline for Zuffa to file a motion to seal Plaintiffs’ Opposition to Zuffa’s Motion for Summary
5 Judgment (“Plaintiffs’ Opposition”). The Parties seek to extend the deadline set forth in the Revised
6 Stipulation and Protective Order, which provides that the party claiming protection has five days after
7 a filing is provisionally lodged under seal to file a motion to seal. ECF No. 217 ¶ 14.3. The current
8 deadline for Zuffa to file a motion to seal Plaintiffs’ Opposition is September 26, 2018. The parties
9 hereby jointly move the Court for a one-week extension such that the motion to seal would be due on
10 October 3, 2018. This is the first joint motion for extension of time to file a motion to seal.

11 The Parties have met and conferred, reached an agreement, and now jointly move to extend
12 the deadline for Zuffa’s Motion to Seal one week. As required by Local Rule 26-4, the Parties have
13 good cause to extend the deadline because of the length of Plaintiffs’ Opposition and the significant
14 volume of accompanying exhibits. Plaintiffs’ Opposition is 45 pages in length and is accompanied by
15 141 exhibits. Decl. of Stacey K. Grigsby in Support of Joint Motion to Extend Deadline to File
16 Motion to Seal ¶ 4 (“Grigsby Decl.”). Zuffa is currently reviewing each of these exhibits to determine
17 which ones contain highly confidential information. *Id.* at ¶ 5.

18 An additional week will allow Zuffa to more completely review the necessary documents. In
19 addition, because other motions to seal have been disputed in the past in this matter, Zuffa wishes to
20 ensure its review is as thorough as possible. *See, e.g.*, ECF No. 581; Grigsby Decl. ¶ 6. Extending the
21 filing deadline will give Zuffa the time to ensure all of the exhibits it seeks to seal meet the
22 compelling reasons standard and to ensure Zuffa makes its requests to seal as narrowly tailored as
23 possible in an effort to minimize any potential disputes. The Parties agree that it is in their collective
24 interest to ensure that Zuffa’s sealing requests are as narrowly tailored as possible to reduce any
25 sealing disputes. Grigsby Decl. ¶ 7.

26 The Parties respectfully request that the Court grant a brief, one-week extension of time to file
27 Zuffa’s Motion to Seal until October 3, 2018 because good cause exists for the extension as described
28 above.

Dated: September, 25 2018

Dated: September 25, 2018

JOSEPH SAVERI LAW FIRM, INC.

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By: /s/ Kevin E. Rayhill

By: /s/ Stacey K. Grigsby

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ATTESTATION OF FILER

The signatories to this document are myself and Kevin Rayhill, and I have obtained Mr. Rayhill's concurrence to file this document on his behalf.

Dated: September 25, 2018

/s/ Stacey K. Grigsby
Stacey K. Grigsby

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Joint Motion to Extend Deadline for Zuffa to File Motion to Seal Plaintiffs' Opposition to Zuffa's Motion for Summary Judgment (ECF No. 599) was served on September 25, 2018 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Roderick Crawford

Roderick Crawford